



United States Department of Agriculture

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Food Safety and Inspection  
Service

June 27, 2022

Office of Field Operations  
Jackson District Office  
713 S Pear Orchard Rd.  
Plaza 2, Suite 402  
Ridgeland, MS 39157

**Via Email: [lightfootfarmtn@gmail.com](mailto:lightfootfarmtn@gmail.com)  
And FedEx Tracking Number  
#777238836425**

Mr. Neil Lightfoot, Owner  
Lightfoot Farm Market & Processing, Est. M47646  
7422 Ward Road  
Millington, TN 38053

### **NOTICE OF SUSPENSION HELD IN ABEYANCE**

Dear Mr. Lightfoot:

On June 23, 2022, a “Notice of Suspension” was issued to suspend the assignment of inspectors for your federal slaughter activities at Lightfoot Farm Market & Processing, Est. M47646. This action was based on your establishment’s failure to handle livestock humanely according to 9 CFR Part 313. Specifically, on Thursday, 23 June 2022, at approximately 0800 hours (Lightfoot Farm Market, - Millington, TN). While observing kill floor operations, the Consumer Safety Inspector (CSI) observed the following non-compliance. After ante-mortem inspection, a young steer was loaded into the knock-box and restrained in a head chute. The animal stood calmly and was not overly excited. The stun operator approached the bovine and administered the first stun with a .22 caliber long-rifle. This attempted stun was ineffective as the animal remained standing with conscious eye tracking. The rifle was immediately reloaded by the stun operator, and a second shot was administered from the same rifle. This shot was also ineffective, the animal remained standing, and vocalized. A third attempt delivered with the same firearm was ineffective, as the animal remained standing with conscious eye tracking. The stun operator reloaded the same firearm and rendered the animal insensible with the fourth stun attempt, and it remained so thereafter. Mr. Neil Lightfoot, Establishment Owner, was verbally notified of the non-compliance and a regulatory control action was taken, tagging the knock box with U.S. Retained/Rejected Tag No. B-45684276.

On June 23 and June 24, 2022, you submitted your first and second responses with written corrective actions and preventive measures to meet the requirements of the Humane Methods of Slaughter Act. The Jackson District Office analyzed your response and advised you that the proffered corrective actions and preventive measures were not adequate.

On June 27, 2022, you provided your third response. The Jackson District Office analyzed your response and determined that the response adequately addressed the identified issues. On June 27, 2022, at 2:30 PM CDT, the Deputy District Manager telephoned you and verbally notified you that the corrective actions and preventive measures you proffered were adequate to meet the requirements to place Lightfoot

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Farm Market & Processing, Est. M47646, under a “Notice of Suspension Held in Abeyance.” This letter formally informs you of this action. Specifically, you stated that the root cause of the humane handling failure was due to the angle of the animal’s head in comparison of the rifle, the velocity of the caliber, and not having a back-up method of stun; you stated that the event occurred most likely because of the animal not having the proper head restraint and possibly the angle of the shot; you stated that your Establishment Owners purchased a new, higher velocity or caliber stun method and took proper gun training courses; you stated that you will utilize the .22 WMR as your primary stun device for bovine and the .410 shotgun with slug will be utilized for bovine weighing over 1200 pounds; you stated that you will utilize the .22 WMR for swine and the backup stun device (.22 WMR or .410 shotgun with slug) will be based on your stun operator’s discretion; you stated that all stun devices will be used in a practice firing range before use at your establishment and inspected slaughter; you stated that your backup stun device will be located near the knockbox, within arm’s reach available for immediate retrieval and utilization in the event of a single ineffective stun; you stated that you purchased a dry storage box; you stated that a new document titled “Ammunition Storage and Procedures” was created and hung in your storage area with guns which you provided; you stated that a new maintenance log was created for your establishment and includes a section titled “Stun Device Maintenance and Monitoring Log”; you stated that routine inspection will be done once a week and logged on the “Stun Device Maintenance and Monitoring Log”; you stated that stun devices will be fully disassembled and cleaned once a month and logged on the “Stun Device Maintenance and Monitoring Log”; you stated that both stun devices will be carried to an appropriate range and tested once a quarter for accuracy and functions and the results will be logged on the “Stun Device Maintenance and Monitoring Log”; you stated that you have purchased and installed a new heavy duty Arrowquip Q-Catch 74 Series with Head Restraint which you stated will give stability, steady pressure of the animal for calmness and placement to ensure the head is held at the proper height for accurate stunning; you stated that this knockbox was purchased as a permanent fixture to be utilized in all inspected slaughter whether it be bovine or swine; you stated that you have printed Landmark Charts for beef and swine which you stated you have posted in your kill floor area; you stated that your Establishment Owner/Stun Operator has reviewed and completed refresher training which included reviewing FR Docket #04-013N, FSIS Directive 6900.2 Revision 3, and “Part 3: The ABCs of Animal Handling Video from North American Meat Institute” and attested to the completion of these trainings on your establishment’s “List of Humane Handling Materials Reviewed” document which you provided; you stated that your Establishment Owner/Stun Operator has completed video review of “Part 5: Stunning and Determining Insensibility and the Use of Firearms – Temple Grandin” and that the record of training is recorded on the “Lightfoot Farm Market & Processing Stun Training Log” which you provided; you stated that your establishment stunning personnel will receive refresher training on a yearly basis; you provided your “Stun Device Maintenance and Monitoring Log”.

A copy of the FSIS Verification Plan (VP) will be provided to assist you in understanding the nature and importance of the Agency’s verification activities. The FSIS Verification Plan is designed to verify that your establishment fully implements the revisions to its humane handling of animals and other corrective actions and preventive measures stated in your June 23, June 24, and June 27, 2022, responses and that these revisions and corrective actions and preventive measures are effective in ensuring future regulatory compliance. The FSIS Verification Plan identifies your corrective actions, the regulatory requirement(s), and the PHIS Task under which FSIS officials will verify the implementation and effectiveness of your proffered action plan.

Please be further advised that this suspension of inspection at your establishment will remain in Abeyance pending verification by FSIS that your proposed corrective actions and preventive measures have been

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implemented and are effective in ensuring future regulatory compliance. Agency personnel will begin immediate verification of your corrective actions and preventive measures.

It is important for you to understand that FSIS has the responsibility to initiate action if your establishment fails to operate in accordance with the regulations, or conditions occur that do not comply with the Humane Methods of Slaughter Act. In these situations, FSIS personnel will take regulatory control of product or other appropriate action.

Please be advised that as a federally inspected establishment, you are expected to comply with the Federal Meat Inspection Act and the Humane Methods of Slaughter Act, and all applicable regulations and other requirements concerning the preparation, sale, and transportation of meat products. Failure to comply with these requirements or to effectively implement the measures addressed in your responses, dated June 23, June 24, and June 27, 2022, could result in the immediate suspension of inspection at your establishment or other appropriate action(s).

If you have any questions about this action, please contact the Jackson District Office at (601) 965-4312.

Sincerely,

**KERMIT  
HARVEY**

Dr. Larry Davis  
District Manager  
Jackson District Office

Digitally signed by KERMIT  
HARVEY  
Date: 2022.06.27 15:09:10  
-05'00'

*for:*

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Cc: (b) (6)

Dr. Larry Davis, DM (via electronic copy)

Dr. Damon Ranftle, DDM (via electronic copy)

Dr. Kermit Harvey, DDM (via electronic copy)

(b) (6)

Washington, D. C. FSIS HQ personnel (via electronic copy)